

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)
Albert Aaron Eckard,) Case No. 07-45947
)
) Chapter 13
Debtor.)

MOTION TO VACATE ORDER OF RELIEF

COMES NOW Debtor, Albert A. Eckard, by and through counsel, Nathan H. Goldberg, Goldberg Law Firm, LLC, and for his motion states as follows:

1. The Debtor filed Chapter 13 on September 11, 2007 and the case was subsequently confirmed on November 7, 2007.
2. Chrysler is a secured creditor on a 2002 PT Cruiser and a 2003 Jeep Liberty which is being paid through the plan at 100% plus interest.
3. Debtor fell behind due to illness and although he attempted to become current Debtor was unable to become current in a timely manner
4. The debtor fell behind due to illness and is better and earning at full capacity.
5. Chrysler filed a motion for relief on February 15, 2011 and the order was granted on May 12, 2011. Debtor sent \$1,103.44 to counsel to make him current and to give adequate protection to Chrysler.
6. Counsel has forwarded certified funds to John V. LaBarge, chapter 13 Trustee.
7. Both vehicles are necessary for reorganization.

WHEREFORE, Debtors respectfully request this honorable court enter an order granting debtors request or for any other order the court deems necessary and proper.

Respectfully Submitted,
GOLDBERG LAW FIRM, LLC

/s/ Nathan H Goldberg
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing were served upon the persons listed below by first class mail, postage prepaid or via email as certified by the court's computer ECF/CM system on May 21, 2011.

John V. LaBarge, Jr.
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Kathryn Klein
Riezman Berger, P.C.
7700 Bonhomme Avenue, 7th Floor
St. Louis, MO 63105

Respectfully Submitted,
GOLDBERG LAW FIRM, LLC

/s/ Nathan H Goldberg
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